

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**REGINA SAMUELS**

Plaintiff,

v.

**CITY OF CLEVELAND HEIGHTS, et al.**

Defendants.

)  
)  
) CASE NO.  
)  
)  
) JUDGE  
)  
) **AFFIDAVIT OF MERIT OHIO**  
) **CIV.R. 10(D)(2)**  
)  
)

Robert C. Krause, MS, EMT-P, being first duly sworn, states that I am a certified paramedic and certified emergency medical services instructor at the EMT-Basic, EMT-Advanced, and EMT-Paramedic levels. I devote more than 50% of my time to active practice in the field of my specialties or to its instruction in Toledo, Ohio. I have reviewed all medical records reasonably available to the plaintiff concerning the allegations of medical malpractice and wrongful death contained in the complaint. I am familiar with the applicable standard(s) of care and am of the opinion that such standard(s) of care were breached by the Cleveland Heights Fire Department, overseen by Dr. Jeffrey Luk, MD, and emergency responders Richard Hwodeky, Brian Gamble, and Matthew Martin. I am further of the opinion that such breaches of care caused injury and death to Ralkina Jones.

Dated: 12 July 16

Robert C. Krause  
Robert C. Krause

NOTARY

Sworn to before me and subscribed in my presence this 12<sup>th</sup> day of July, 2016.



MELISSA K. MOLINSKI  
Notary Public - State of Ohio  
My Commission Expires July 2, 2019

Melissa K. Molinski